

1 CHRISTINA H. WANG, ESQ.
Nevada Bar No. 9713
2 FIDELITY NATIONAL LAW GROUP
8363 W. Sunset Road, Suite 120
3 Las Vegas, Nevada 89113
Telephone: (702) 667-3000
4 Fax: (702) 938-8721
Email: christina.wang@fnf.com
5 *Attorneys for Defendant*
Fidelity National Title Agency of Nevada, Inc.
6
7
8

9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE DISTRICT OF NEVADA**

11 * * *

12 UNITED STATES OF AMERICA,
13 Plaintiff,

14 v.

15 JEFFREY A. MARTINEZ, individually, and
as trustee of the Martinez Family Trust;
16 DOLORES M. MARTINEZ, individually
and as Trustee for the Martinez Family
Trust; THE MARTINEZ FAMILY TRUST;
17 MARTINEZ & ASSOCIATES, INC.
(NV20041370692); MARTINEZ &
18 ASSOCIATES INC. (NV20181033912);
SIERRA MORTGAGE CORPORATION;
19 FIDELITY NATIONAL TITLE; CHASE
MORTGAGE COMPANY; JP MORGAN
20 CHASE BANK NATIONAL
ASSOCIATION; NEVADA MORTGAGEE
21 ASSITANCE COMPANY, LLC; THE
COOPER CASTLE LAW FIRM, LLP;
22 RHODES RANCH ASSOCIATION;
REPUBLIC SILVER STATE INC., DBA,
23 REPUBLIC SERVICES,

24 Defendants.
25

Case No.: 2:19-cv-01986-GMN-DJA

**DISCLAIMER OF INTEREST OF
FIDELITY NATIONAL TITLE
AGENCY OF NEVADA, INC. AND
STIPULATION AND [PROPOSED]
ORDER FOR DISMISSAL**

26 Plaintiff UNITED STATES OF AMERICA ("Plaintiff"), by and through its attorney of
27 record, E. Carmen Ramirez, Esq. of the U.S. Department of Justice; and Defendant FIDELITY
28 NATIONAL TITLE AGENCY OF NEVADA, INC. ("FNTA"), incorrectly identified in the

1 Complaint as Fidelity National Title, by and through its attorneys of record, the Fidelity
2 National Law Group, hereby stipulate and agree as follows:

3 WHEREAS,

4 1. Plaintiff named FNTA as a defendant in this action on the basis that FNTA may
5 claim an interest in the real property commonly known as 262 Cliff Valley Drive, Las Vegas,
6 Nevada 89148, Clark County, Nevada, Assessor's Parcel No.: 176-08-310-113 (the
7 "Property").

8 2. FNTA reasonably believes that it has been named as a defendant solely because it
9 is identified as Trustee in a Deed of Trust that was recorded against the Property on July 31,
10 2000, as Book/Instrument No. 20000731-01663 of the Official Records of Clark County,
11 Nevada.

12 3. FNTA reasonably believes that it has not been named as a defendant due to any
13 acts or omissions on its part in the performance of its duties as Trustee.

14 4. FNTA hereby disclaims any interest in the Property.

15 WHEREFORE,

16 **IT IS HEREBY STIPULATED AND AGREED** that FNTA has no claim to or interest
17 in the Property.

18 **IT IS FURTHER STIPULATED AND AGREED** that FNTA should be dismissed
19 from this action, without prejudice, because it has no claim to or interest in the Property.

20 ///

21 ///

22 ///

23

24

25

26

27

28

IT IS FURTHER STIPULATED AND AGREED that each party shall bear its own attorney's fees and costs as to this disclaimer.

DATED this 8th day of January, 2020

FIDELITY NATIONAL LAW GROUP

/s/ E. Carmen Ramirez

/s/ Christina H. Wang

RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

CHRISTINA H. WANG, ESQ.
Nevada Bar No. 9713
8363 W. Sunset Road, Suite 120
Las Vegas, Nevada 89113
Attorneys for Defendant
Fidelity National Title Agency of Nevada, Inc.

E. CARMEN RAMIREZ
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 683
Washington, D.C. 20044

Of Counsel:
NICHOLAS A. TRUTANICH
United States Attorney

IT IS SO ORDERED.

Dated this 29 day of January, 2020.

Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT